

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

OLD WHITE CHARITIES, INC.,

Plaintiff,

v.

Civil Action No: 5:17-CV-01375

BANKERS INSURANCE, LLC,

Defendant/Third-Party Plaintiff,

v.

ALL RISKS, LTD.,

Third-Party Defendant.

**THIRD-PARTY DEFENDANT ALL RISKS LTD.'S
MOTION FOR SUMMARY JUDGMENT ON
BANKERS INSURANCE, LLC'S THIRD-PARTY COMPLAINT**

COMES NOW Third-Party Defendant, All Risks Ltd. ("All Risks"), by and through its undersigned counsel, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and hereby moves this Honorable Court for summary judgment on Third-Party Plaintiff Bankers Insurance, LLC's ("Bankers") claims.

The reasons and authorities in support of the motion are more fully set forth in the Memorandum of Law in Support of Third-Party Defendant, All Risks' Motion for Summary Judgment which is filed contemporaneously herewith, and supporting Exhibits, All Risks' Exhibits A-C, are filed as attachments hereto and in support of this motion.

For all of the reasons and authorities set forth in the accompanying Memorandum, Third-Party Defendant, All Risks, respectfully moves that its motion for summary judgment be granted, and for such other and further relief as the Court may deem appropriate.

Respectfully submitted the 26th day of February, 2018.

**Third-Party Defendant,
ALL RISKS, LTD., By Counsel:**

/s/ *Debra Tedeschi Varner*

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CERTIFICATE OF SERVICE

This is to certify that on the 26th day of February, 2018, the undersigned counsel served the foregoing “***THIRD-PARTY DEFENDANT ALL RISKS LTD.’S MOTION FOR SUMMARY JUDGMENT***” upon counsel of record via one or more of the following methods: (1) electronic notification through the Court’s CM/ECF system; and/or (2) facsimile, and/or (3) depositing true copies in the United States Mail, postage prepaid, in envelopes addressed as follows:

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